

DANIEL DONOVAN
Attorney at Law
P.O. Box 6573
Great Falls, MT 59406
dan@danieldonovanlaw.com
Telephone: (406) 868-3753
Counsel for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

UNITED STATES OF AMERICA,)	
)	CR 14-101-GF-BMM
)	CR 15-03-GF-BMM
Plaintiff,)	CR 15-04-GF-BMM
)	
-vs-)	UNOPPOSED
)	MOTION
)	TO
)	CONTINUE
TIMOTHY WARREN ROSETTE,)	SENTENCING HEARING
)	
Defendant.)	
)	

TIMOTHY WARREN ROSETTE, the above-named Defendant, by and through his counsel of record, DANIEL DONOVAN, moves the Court to continue the Sentencing Hearing currently scheduled for October 29, 2015. Mr. Rosette further moves the Court to extend the pre-sentencing deadlines.

This Motion is based on the following grounds and reasons:

1. Defense Counsel was recently appointed to represent Mr. Rosette; and

2. Defense Counsel needs additional time to review the files and records in this case, to confer with Mr. Rosette, and to prepare for sentencing.

Defense Counsel respectfully requests that the Sentencing Hearing and the pre-sentencing deadlines be continued for at least 30 days.

The Government has been contacted and is in agreement with this Motion as is Mr. Rosette.

DATED this 16th day of September, 2015.

TIMOTHY WARREN ROSETTE

By: /s/ Daniel Donovan
DANIEL DONOVAN
Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2015, a copy of the foregoing document was served on the following persons by the following means:

<u>1, 2</u>	CM-ECF
_____	Hand Delivery
<u>3</u>	Mail
_____	Overnight Delivery Service
_____	Fax
_____	E-Mail

1. CLERK, UNITED STATES DISTRICT COURT
2. CARL E. ROSTAD
Assistant U.S. Attorney
Counsel for Plaintiff
3. TIMOTHY WARREN ROSETTE
Defendant

/s/ Daniel Donovan
DANIEL DONOVAN